



– Permit #:

Revisions:

Permit Issued:

Permit Expires:

This checklist is provided as a tool for permit holders and ADEQ staff to have a consistent understanding of the major compliance expectations under this permit. This checklist is designed to be easy to read and follow. It is intended only to address the permit requirements that ADEQ feels are the most important to protect human health and the environment. This list does not include every permit condition and permit holders should ensure they understand the full requirements of their permit. This list does not supplant or supersede any legal requirement and is not binding on the permit holder or ADEQ staff.

Requirements from General Permit	Requirement Met? (Yes, No, N/A) Please include any comments.
ATTACHMENT A: GENERAL PROVISIONS	
Posting of Permit Attachment A, Section IV.A General Permit or certificate posted and is clearly visible and accessible.	
Posting of Permit Attachment A, Section IV.A All equipment covered by the permit is clearly marked with one of the following: Current permit number, serial number, or equipment ID listed in the permit?	
Posting of Permit Attachment A, Section IV.B A copy of the complete permit is kept onsite?	
Annual Emission Inventory Questionnaire Attachment A, Section VI.A The Permittee shall complete and submit to the Director an annual emissions inventory questionnaire. The questionnaire is due by March 31st or ninety days after the Director makes the inventory form available each year, whichever occurs later, and shall include emissions information for the previous calendar year.	
Compliance Certification Attachment A, Section VII.A The Permittee shall submit to the Director a compliance certification once each year, which describes the compliance status of the source with respect to each General Permit condition and the methods used for determining the compliance status. The Permittee shall list on the compliance certification all items of equipment issued ATO(s), on site at the time of annual certification. This certification shall be submitted by September 30th and shall cover the period from	

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September 1st of the previous year to August 31st of the current year.	
II. FACILITY WIDE LIMITATIONS	
Operating Limitations Attachment B, Section II.A.2 The Permittee shall display the name, address, and phone number of a current contact person at the site of the SVEU in a manner that is clearly visible and accessible.	
Operating Limitations Attachment B, Section II.A.3 The Permittee shall operate and maintain the equipment identified in the Authorization to Operate (ATO) in accordance with manufacturer's specifications.	
Operating Limitations Attachment B, Section II.A.4 Where a stack, vent or other outlet is at such a level that fumes, gas mist, odor, smoke, vapor or any combination thereof constituting air pollution is discharged to adjoining property, the Director may require the installation of abatement equipment or the alteration of such stack, vent, or other outlet by the Permittee thereof to a degree that will adequately dilute, reduce or eliminate the discharge of air pollution to adjoining property.	
Operating Limitations Attachment B, Section II.A.5 The Permittee shall not emit gaseous or odorous material from equipment, operations or premises under their control in such quantities or concentrations as to cause air pollution.	
Operating Limitations Attachment B, Section II.A.6 The stack height for the SVEU shall not be less than 13 feet from ground level.	
Operating Limitations Attachment B, Section II.A.7 The Permittee shall not directly discharge Volatile Organic Compounds (VOCs) into the atmosphere at any time without passing through the operating air pollution control device identified in the ATO.	
Operating Limitations Attachment B, Section II.A.8 The Permittee shall use only natural gas, propane, or electric	

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power to operate the SVEU.	
Operating Limitations Attachment B, Section II.A.9 <u>The Permittee shall not remediate any gas stream entering the SVEU control device with a VOC concentration greater than 20,000 ppmv or the manufacturer's specifications, whichever is less.</u>	
Monitoring and Record Keeping Requirements Attachment B, Section II.B.1 The Permittee shall maintain copies of the manufacturer's specifications for all of the equipment identified in the ATO on site.	
Monitoring and Record Keeping Requirements Attachment B, Section II.B.2 The Permittee shall retain records of all required monitoring data and support information for a minimum of five years from the date of generation in accordance with Section XI of Attachment "A".	
III. THERMAL/CATALYTIC OXIDIZERS REQUIREMENTS	
Thermal and Catalytic Oxidizer Operating Requirements Attachment B, Section III.A.1.a <u>The Permittee shall operate the thermal or catalytic oxidizer such that it shall achieve a minimum 90% VOC destruction efficiency.</u> This limit is not applicable when the inlet VOC concentration is less than or equal to 1000 ppmv.	
Thermal and Catalytic Oxidizer Operating Requirements Attachment B, Section III.A.1.c The Permittee shall maintain the process temperature of the thermal oxidizer to be equal to or greater than 1400°F.	
Thermal and Catalytic Oxidizer Operating Requirements Attachment B, Section III.A.1.d The Permittee shall maintain the process temperature of the catalytic oxidizer to be equal to or greater than 600°F.	
Thermal and Catalytic Oxidizer Operating Requirements Attachment B, Section III.A.1.e <u>The Permittee shall not remediate any gas stream at the inlet of an SVEU device using catalytic or thermal oxidation with a mass flowrate of halogenated compounds greater than 0.052 grams/second.</u>	
Monitoring Requirements Attachment B, Section III.A.2.a	

Requirements from General Permit	Requirement Met? (Yes, No, N/A) Please include any comments.
<u>The Permittee shall install and maintain a temperature recording device with an accuracy of ±5 degrees Fahrenheit (°F) to measure and continuously record the process temperature of the thermal or catalytic oxidizer.</u>	
Monitoring Requirements Attachment B, Section III.B.1.b The opacity of any plume or effluent shall not be greater than 20 percent.	
Volatile Organic Compounds Emission Standards Attachment B, Section III.C.1 <u>The Permittee shall limit the emissions of VOCs exiting the SVEU to less than 90 tons per year on a 12-month rolling total.</u>	
Volatile Organic Compounds Monitoring Requirements Attachment B, Section III.C.2.a At each location at which the SVEU is operated, the Permittee shall take a representative grab sample of the inlet and outlet vapor stream of the SVEU device upon startup at each new location, and then once every two weeks for the first six weeks, then monthly for the following six months, and then quarterly thereafter.	
Volatile Organic Compounds Monitoring Requirements Attachment B, Section III.C.2.b The Permittee shall determine from the representative grab samples taken in accordance with Condition III.C.2.a above, the concentration of VOCs and halogenated compounds at the inlet of the SVEU and the concentration of the VOCs exiting the SVEU. The Permittee shall analyze the samples using EPA Reference Method 8260B or EPA Method TO-15 or equivalent methods approved by the Director.	
Volatile Organic Compounds Recordkeeping Requirements Attachment B, Section III.C.3.a The Permittee shall calculate and record a 12-month rolling total of VOC emissions at the end of each month.	
Volatile Organic Compounds Recordkeeping Requirements Attachment B, Section III.C.3.b The Permittee shall sum the concentration of all halogenated	

Requirements from General Permit	Requirement Met? (Yes, No, N/A) Please include any comments.
compounds in ppmv identified in the analysis required in Condition III.C.2.b in order to determine compliance with the allowable inlet concentration in Condition III.A.1.e.	
IV. CARBON ADSORPTION REQUIREMENTS	
Operating Requirements Attachment B, Section IV.A.1.a <u>If carbon adsorption is used, the Permittee shall maintain a minimum of 2 granulated activated carbon (GAC) canisters arranged in series.</u>	
Operating Requirements Attachment B, Section IV.A.1.e The Permittee shall replace the carbon canisters when the calculated breakthrough time for the first stage canister is reached. The monitoring required by Condition IV.C.2.a., along with other relevant factors including the working capacity of the GAC canister shall be used to determine the time the system can operate before breakthrough occurs.	
Operating Requirements Attachment B, Section IV.A.1.e <ul style="list-style-type: none"> • At the request of the Director, the Permittee shall measure flow at the stack of the carbon adsorption unit to obtain the total actual flow rate of gases exiting the unit. • The Permittee shall maintain records of the serial number of each canister of activated carbon, the date each is installed, the position in the series (first, second, or third stage position, etc.) and the date removed from service. 	
Emission Standards Attachment B, Section IV.B.1.b The opacity of any plume or effluent shall not be greater than 20 percent.	
Volatile Organic Compounds Emission Standards Attachment B, Section IV.C.1 <u>The Permittee shall limit the emissions of VOCs exiting the SVEU to less than 90 tons per year on a 12-month rolling total.</u>	
Volatile Organic Compounds Monitoring Requirements Attachment B, Section IV.C.2.a At each location at which the SVEU is operated, the Permittee shall take a representative grab sample of the inlet and outlet vapor stream of the SVEU device upon startup at each new	

Requirements from General Permit	Requirement Met? (Yes, No, N/A) Please include any comments.
location, and then once every two weeks for the first six weeks, then monthly for the following six months, and then quarterly thereafter.	
Volatil Organic Compounds Monitoring Requirements Attachment B, Section IV.C.2.a The Permittee shall determine from the representative grab samples taken in accordance with Condition III.C.2.a above, the concentration of VOCs and halogenated compounds at the inlet of the SVEU, the concentration of the VOCs exiting the SVEU. The Permittee shall analyze the samples using EPA Reference Method 8260B or EPA Method TO-15 or equivalent methods approved by the Director.	
Volatil Organic Compounds Recordkeeping Requirements Attachment B, Section IV.C.3.a The Permittee shall calculate and record a 12-month rolling total of VOC emissions at the end of each month. Appendix "A" explains how to complete this calculation.	
V. CONDITIONS SPECIFIC TO PORTABLE SOURCES	
Move Notice Attachment B, Section V.B A portable source granted coverage under a general permit may be transferred from one location to another provided that the Permittee of such equipment notifies the Director, and any control officer who has jurisdiction over the geographic area that includes the new location of the transfer prior to the transfer.	
ATTACHMENT C: SPECIFIC CONDITIONS ADDITIONAL REQUIREMENTS FOR SOURCES OPERATING IN MARICOPA OR PIMA COUNTIES	
I. REQUIREMENTS FOR SOURCES OPERATING IN MARICOPA COUNTY The Permittee shall abide by all requirements of Attachment "B" and the following requirements while operating in Maricopa County. If more than one emission limit or emission standard is applicable to the same source, the more stringent standard or emission limit shall apply.	
Odor Limiting Standard Attachment C, Section I.A.1 The Permittee shall not emit gaseous or odorous air contaminants for equipment, operations or premises under his control in such quantities or concentrations as to cause air pollution.	
Opacity Standard	

Requirements from General Permit	Requirement Met? (Yes, No, N/A) Please include any comments.
<p>Attachment C, Section I.A.2 The Permittee shall not discharge into ambient air from any single source of emission any air contaminants, other than uncombined water, in excess of 20 percent opacity for a period aggregating more than three minutes in any 60-minute period.</p>	
<p>Organic Solvents and Other Organic Materials Attachment C, Section I.A.3 The Permittee shall not store, discard, or dispose of VOC or VOC containing material in a way intended to cause or allow the evaporation of VOC to the atmosphere.</p>	
<p>Thermal/Catalytic Oxidizer and Carbon Adsorption Requirements Volatile Organic Compounds Attachment C, Section I.B.1.b <u>The Permittee shall limit the emissions of VOCs to less than 22.5 tons per year on a rolling twelve month total basis.</u></p>	
<p>Thermal/Catalytic Oxidizer and Carbon Adsorption Requirements Volatile Organic Compounds Attachment C, Section I.B.1.b The Permittee shall reduce the VOC emissions to the atmosphere by at least one of the following methods:</p> <ul style="list-style-type: none"> • Incineration, provided that 90 percent or more of the carbon in the VOC compounds entering the incineration device is oxidized to carbon dioxide and overall efficiency (capture plus processing) is at least 85 percent by weight; or • Adsorption, provided that overall control efficiency (capture plus processing) is at least 85 percent by weight. 	
<p>Thermal/Catalytic Oxidizer and Carbon Adsorption Requirements Record Keeping Requirements Attachment C, Section I.B.2 The Permittee shall maintain a log detailing the daily VOC emissions emanating from the SVEU stack.</p>	
<p>II. REQUIREMENTS FOR SOURCES OPERATING IN PIMA COUNTY The Permittee shall abide by all requirements of Attachment “B” and the following requirements while operating in Pima County: If more than one emission limit or emission standard is applicable to the same source, the more stringent standard or emission limit shall apply.</p>	
<p>Operating Limitations Attachment C, Section II.A</p>	

Requirements from General Permit	Requirement Met? (Yes, No, N/A) Please include any comments.
<p>The Permittee of any stationary or portable source of air pollution which burns any material, except natural gas, shall keep records of the material used as fuel. The Permittee of any stationary or portable of air pollution which incinerates any material shall complete records of all materials incinerated.</p>	
<p>Visibility Limiting Standard Attachment C, Section II.C.1 The Permittee shall not cause, suffer, allow or permit operations or activities likely to result in excessive amounts of airborne dust without taking reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne.</p>	
<p>Visibility Limiting Standard Attachment C, Section II.C.2 The opacity of a plume or effluent from any point or fugitive emission source shall not exceed 20% as determined by EPA Reference Method 9, Appendix A, 40 CFR Part 60.</p>	
<p>Visibility Limiting Standard Attachment C, Section II.C.3 The Permittee shall not cause or permit the airborne diffusion of visible emissions, including fugitive dust, beyond the property boundary line within which the emissions became airborne. The Permittee shall be required to cease temporarily the activity or operation which is causing or contributing to the emissions until reasonably necessary and feasible precautions are taken.</p>	
<p>Recordkeeping for Compliance Determination Attachment C, Section II.D The Permittee shall retain a copy of the permit onsite including all required monitoring records and support information for review by the Control Officer. In addition, all equipment identified in the permit equipment list shall be marked with a unique, clearly visible, and accessible ID to identify the piece of equipment. The Permittee shall be considered in compliance by demonstrating that sufficient information on the equipment and facility operations is periodically collected, recorded, and maintained to assure that the compliance status of any Specific Condition in this Attachment can be readily ascertained at any time. This information shall be retained for at least 5 years.</p>	